

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

FREDRIC N. ESHELMAN,
Plaintiff,

v.

TRUE THE VOTE, INC.,
CATHERINE ENGELBRECHT,
GREGG PHILLIPS,
OPSEC, LLC,
JAMES BOPP, JR., AND
THE BOPP LAW FIRM,
Defendants.

Case No. 4:20-cv-04034

DECLARATION OF D. VICTORIA BARANETSKY

My name is D. Victoria Baranetsky. I am older than the age of eighteen (18) and a resident of the state of California. I am of sound mind and capable of testifying regarding the matters set forth in this Declaration. I am General Counsel of the Center for Investigative Reporting, the oldest nonprofit newsroom in the country and am licensed to practice law in the state of California, New York and New Jersey. I submit this declaration based on my own personal knowledge. If called upon as a witness, I would competently testify to the truth of each statement herein.

1. Attached as Exhibit 1 is a true and correct copy of the Wells Fargo Bank Statement—labeled “Bopp Defs. 0013”—which was filed in *Eshelman v. True the Vote, Inc., et al.*, No. 2021V-0015 (155th Jud. District, Austin County, TX, filed Feb. 1, 2021).
2. Attached as Exhibit 3 is a true and correct copy of correspondence demonstrating CIR’s efforts to meet and confer with counsel for the parties.
3. On Friday, September 2, 2022, I emailed Counsel for Plaintiff and Counsel for Defendants to seek their consent to unseal the documents filed under seal in this case. On September

2, 2022, Mr. James Bopp, Jr., Counsel for Defendants responded that Defendants do not consent. On September 8, 2022, Mr. Ronald Jacobs, Counsel for Plaintiff Fredric N. Eshelman responded that Plaintiff Eshelman consents to unsealing.

Dated: September 9, 2022

/s/ D. Victoria Baranetsky
D. Victoria Baranetsky